

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**STEPHEN GRAY, INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,**

**Plaintiff,**

**-against-**

**CITIGROUP INC., CHARLES PRINCE, THE  
PLANS ADMINISTRATIVE COMMITTEE OF  
CITIGROUP INC., THE 401(K) INVESTMENT  
COMMITTEE, AND JOHN DOES 1-20,**

**Defendants.**

**Civil Action No.: 07 CIV 9790  
(SHS) (DCF)**

**PLAINTIFF CHRIS SOUTHARD'S RESPONSE TO THE GRAY AND TADROS  
PLAINTIFFS' MOTION FOR (1) CONSOLIDATION (2) APPOINTMENT OF LEAD  
PLAINTIFFS AND LEADERSHIP STRUCTURE AND (3) ENTRY OF [PROPOSED]  
PRETRIAL ORDER NO 1**

December 11, 2007, Plaintiff Chris Southard filed a complaint against Citigroup, Inc., and certain of its directors, officers, and employees, for violations of the Employee Retirement Income Security Act. See Southard v. Citigroup, Inc., et al., No. 07-11164 (SHS). Plaintiff Southard does not oppose the Motion of the Gray and Tadros Plaintiffs for consolidation, appointment of lead plaintiffs, and the appointment of Wolf Popper LLP and Harwood Feffer LLP as co-lead counsel to prosecute the consolidated ERISA action, see Gray v. Citigroup, Inc., et al., No. 07-cv-09790-SHS, Docket No. 3, filed on November 26, 2007, and joins in that Motion.

Dated: December 12, 2007

**GAINEY & McKENNA**

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Thomas J. McKenna (TM-7109)  
295 Madison Avenue, 4th Floor  
New York, New York 10017  
Tel: (212) 983-1300

*Attorneys for Plaintiff Chris Southard*

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SHAUN ROSE, Individually and On Behalf of All  
Others Similarly Situated,

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Civil Action No: 07 Civ. 10294  
(DC)

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS  
ADMINISTRATIVE COMMITTEE OF CITIGROUP  
INC., THE 401(k) INVESTMENT COMMITTEE, and  
JOHN DOES 1 - 10,

Defendants.

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MEREDITH TRANBERG, individually and on behalf  
of all others similarly situated,

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Civil Action No: 07 Civ. 10341  
(UA)

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS  
ADMINISTRATIVE COMMITTEE OF CITIGROUP  
INC., THE 401(k) INVESTMENT COMMITTEE, and  
JOHN DOES 1 - 20,

Defendants.

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ANTON RAPPOLD, individually and on behalf of all  
others similarly situated,

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Civil Action No: 07 Civ. 10396  
(UA)

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A., CHARLES  
PRINCE, THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN and JANE  
DOES 1 - 10,

Defendants.

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SAMIER TADROS, on Behalf of All Others Similarly  
Situating,

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Civil Action No: 07 Civ. 10442  
(CIA)

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE, C.  
MICHAEL ARMSTRONG, ALAIN J.P. BELDA,  
GEORGE DAVID, KENNETH T. DERR, JOHN M.  
DEUTCH, ROBERTO HERNANDEZ RAMIREZ,  
ANN  
DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW  
N. LIVERJS, ANNE M[ILCAHY, RICHARD D.  
PARSONS, JUDITH RODIN, ROBERT E. RUBIN,  
ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN  
DOES 1-20 (BEING CURRENT AND FORMER  
MEMBERS OF THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.) and JOHN DOES  
21-40 (BEING CURRENT AND FORMER MEMBERS  
OF THE INVESTMENT COMMITTEE OF THE  
CITIGROUP INC. 401(K) PLAN),

Defendants.

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STEPHAN FIORINO, individually and on behalf of all  
others similarly situated,

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Civil Action No: 07 Civ. 10458  
(SHS)

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES  
PRINCE, THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN DOES 1 -  
20,

Defendants.

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JAMES BOLLA, individually and on behalf of all others  
similarly situated,

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Civil Action No: 07 Civ. 10472  
(UA)

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES  
PRINCE, THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN DOES 1 -  
20,

Defendants.

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MARK GEROULO, individually, on behalf of the  
CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K)  
PLAN FOR PUERTO RICO, and all others similarly,

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Civil Action No; 07 Civ. 10461  
(UA)

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN  
ADMINISTRATIVE COMMITTEE OF CITIGROUP,  
INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10,  
THE  
CITIGROUP 401(k) PLAN INVESTMENT  
COMMITTEE and JOHN DOES 10-20, C. MICHAEL  
ARMSTRONG, ALAIN J.P. BELDA, GEORGE  
DAVID,  
KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO  
HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N.  
LIVERIS, DUDLEY C. MECUM, ANNE M.  
MULCAHY, RICHARD D. PARSONS, ANDRALL E.  
PEARSON, CHARLES PRINCE, JUDITH RODIN,  
ROBERT E. RUBIN, FRANKLIN A. THOMAS,  
SANFORD I. WEILL,

Defendants.

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CHRIS SOUTHARD, ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

Civil Action No.: 07-CV-11164  
(SHS)

Plaintiff,

-against-

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL  
ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID,  
KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO  
HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN,  
KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE  
MULCAHY, RICHARD D. PARSONS, JUDITH RODIN,  
ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN  
DOES 1-20 (BEING CURRENT AND FORMER  
MEMBERS OF THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.) AND JOHN DOES  
21-40 (BEING CURRENT AND FORMER MEMBERS OF  
THE INVESTMENT COMMITTEE OF THE CITIGROUP  
INC. 401(K) PLAN,

Defendants.

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